

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE: AUTOMOTIVE PARTS  
ANTITRUST LITIGATION,**

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**Master File No. 12-md-02311**

**THIS DOCUMENT RELATES TO:**

**ALL END-PAYOR ACTIONS**

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**ELEMENT FLEET CORPORATION, WHEELS, INC.,  
DONLEN LLC, AND AUTOMOTIVE RENTALS, INC.’S NOTICE OF  
WITHDRAWAL OF MOTION TO ENFORCE SETTLEMENT AGREEMENTS**

Element Fleet Corporation, Wheels, Inc., Donlen LLC, and Automotive Rentals, Inc., all of which are fleet management companies (collectively, the “FMCs”), hereby notify the Court they have reached a Stipulation and Proposed Order (“Stipulation”) with Class Counsel regarding the FMCs’ Motion to Enforce Settlement Agreements (Dkt. No. 2149) (“Motion”). Class Counsel have submitted (or will submit) the Stipulation for the Court’s review and approval.

In accordance with the Stipulation, the FMCs hereby withdraw their Motion without prejudice pending the Court’s consideration of the Stipulation. In the event the Court approves this Stipulation, the Motion shall be deemed to have been withdrawn with prejudice.

*[Signature on following page]*

Respectfully submitted this 22nd day of December, 2021.

/s/ L. Conrad Anderson IV

Gregory C. Cook

L. Conrad Anderson IV

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*Counsel for Element Fleet Corporation, Wheels,  
Inc., Donlen LLC, and Automotive Rentals, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of December, 2021, I caused the foregoing document to be electronically filed with the Clerk of Court via the Court's CM/ECF system, which will automatically notify all counsel of record.

/s/ L. Conrad Anderson IV

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